

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOCKET NO. 04-cv-30031-KPN

EMBER RUSSELL,

Plaintiff,

v.

LONG VIEW RECREATIONAL
VEHICLES, INC. AND LONG VIEW
RV SUPERSTORES,

Defendants.

JOINT PROPOSED PRETRIAL STATEMENT

Pursuant to Local Rule 16.1(D), Ember Russell (“plaintiff”), and Long View Recreational Vehicles, Inc. D/B/A Long View RV Superstores, (“defendants”), submit the following Joint Proposed Pretrial Statement. Counsel for the parties conferred pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.1(B).

A. Pursuant to Local Rule 16.1(D)(1), the joint discovery plan is as follows:

1. The parties' initial disclosures pursuant to Fed.R.Civ.P. 26(a) shall be served on or before July 15, 2004.
2. All written discovery, with the exception of Requests for Admissions, shall be served on or before August 16, 2004, and all responses thereto shall be due according to the Federal Rules of Civil Procedure deadlines for discovery responses.
3. All non-expert depositions will be completed by November 15, 2004.
4. All written Requests for Admissions shall be served by December 15, 2004, with responses due by January 17, 2005.

5. Plaintiff will serve disclosures and reports of all expert witnesses required under Fed. R. Civ. P. 26(a)(2) by February 15, 2005, and depositions of plaintiff's experts will be completed by March 15, 2005.

7. Defendant will serve disclosures and reports of all expert witnesses required under Fed. R. Civ. P. 26(a)(2) by March 15, 2005, and depositions of defendant's experts will be completed by April 15, 2005.

B. Pursuant to Local Rule 16.1(D)(2):

1. All motions for summary judgment will be filed by May 16, 2005.

2. Oppositions to any Motion for Summary Judgment will be filed by June 15, 2005. Any Replies to the Oppositions will be filed by June 25, 2005.

3. Should Motions for Summary Judgment not be filed by the above date, or should any such motions be denied by the court in whole or in part, the Court will convene another conference to explore settlement and to establish dates for a final pretrial conference and trial.

C. Pursuant to Local Rule 16.1(D)(3), certifications signed by counsel and an authorized representative of each party will be filed with the Court.

Respectfully submitted,

DEFENDANTS
LONG VIEW RECREATIONAL
VEHICLES, INC. D/B/A LONG VIEW
RV SUPERSTORES,
By their attorney,

PLAINTIFF EMBER RUSSELL
By her attorney,

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